

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

)

v.

)

No. 1:19-cr-289 (LO)

)

BRADLEY WILLIAM SULLIVAN,

)

Defendant.

)



STATEMENT OF FACTS

The parties stipulate that the following facts are true and correct and that, had the matter gone to trial, the United States would have proven them beyond a reasonable doubt.

1. The defendant, Bradley William Sullivan, began distributing marijuana during his sophomore year in high school (2014-2015). During that time, the defendant became involved in a conspiracy to distribute marijuana and other controlled substances. From that time until his arrest in 2019, except for periods during which the defendant was incarcerated, the defendant conspired with numerous others, including, but not limited to, Peter Le, a/k/a Savage; Dane Hughes, a/k/a Dream; Angel Le; and Sasha Carlisle, a/k/a Wolf, to distribute in excess of 100 kilograms or more of marijuana and other controlled substances.

2. During the course of his participation in this conspiracy, the defendant became aware that Peter Le, whom he knew as Savage, along with numerous other members of this conspiracy, were also members of, or associated with, a gang called the Reccless Tigers (which includes the Reccless Tigers' affiliated organizations, Club Tiger, Tiger Side, and Asian Boyz). The defendant was "jumped" into (*i.e.*, became a member of) the Club Tigers by Dane Hughes and others in or about August 2017. One of the primary activities of the Reccless Tigers and its affiliated gangs was the sale of marijuana and other controlled substances.

3. In or about 2015, the defendant began obtaining marijuana from Peter Le, some of which was for distribution to the defendant's customers and some of which was for his own use. The defendant initially obtained ounce quantities from Peter Le. The quantities of marijuana the defendant obtained from Peter Le and his co-conspirators increased over time, from a quarter-pound, half-pound, pound, and, eventually, two-pound quantities of marijuana every week to two weeks, most of which was then distributed by the defendant to his customers. The defendant also obtained vape pens containing THC, edibles containing THC, prescription narcotics (e.g., Xanax pills), ecstasy, cocaine, and LSD from Peter Le and his co-conspirators, which the defendant then distributed to customers. The vape pens and edibles often had Reccless Tigers logos or stickers on them.

4. During the course of the conspiracy, the defendant went into debt to Peter Le. The defendant sometimes did not fully pay for some of the marijuana and other drugs he had obtained from Peter Le. In or about 2017, after the defendant was released from a juvenile detention facility, he still owed Peter Le money. As a result, the defendant again began selling marijuana for Peter Le in an effort to pay off his debt. At this time, Dane Hughes was working for Peter Le, and the defendant received his marijuana and other drugs from Peter Le through Dane Hughes and other conspirators. To help pay off his debt, the defendant also drove Dane Hughes to various places in Northern Virginia when Hughes was delivering marijuana or picking up money for Peter Le.

5. The defendant met Peter Le and other co-conspirators in the woods in the Lorton, Virginia, area, to pick up and pay for drugs. Peter Le and Angel Le also rented an apartment in Lorton, Virginia, where Peter Le stored and distributed marijuana and other illegal drugs. The defendant picked up marijuana from Peter Le at this apartment. When the lease expired on the

Lorton apartment, Peter Le and Angel Le leased an apartment in Merrifield, Virginia. The defendant picked up marijuana and other drugs from Peter Le at this apartment as well. Peter Le used Airbnb rentals to receive and store marijuana, and the defendant also picked up marijuana at these Airbnb rentals.

6. The defendant knew that Peter Le had marijuana and other products shipped to him in boxes. The defendant saw boxes containing multiple pounds of marijuana at the apartments and Airbnb rentals used by Peter Le. The defendant also received boxes of marijuana and other products for Peter Le.

7. The defendant usually paid Peter Le in cash. On occasion, he made payments to Peter Le using a Venmo account in the name of Angel Le.

8. In or about the summer of 2017, the defendant owed Peter Le several thousand dollars for drugs. Peter Le told the defendant that he could work on the “farm” to pay off his debt. The “farm” was a marijuana grow operation in California, from which Peter Le and the Reccless Tigers obtained marijuana. The defendant agreed, and, in August 2017, the defendant and two co-conspirators drove in the defendant’s car to California. At the farm in California, the defendant met other co-conspirators and members of the Reccless Tigers and Asian Boyz, including, for example, Sascha Carlisle, a/k/a Wolf, whom the defendant knew worked with Peter Le and Dane Hughes to transport marijuana and money. The defendant worked at the farm for about two months. He harvested and processed marijuana grown at the farm in greenhouses and on outdoor plots. After he earned enough money to pay off his debt to Peter Le, the defendant left the farm in October 2017 and drove home to Virginia.

9. The defendant continued to obtain marijuana and other drugs from Peter Le after returning from the farm. During 2018, he also continued to drive Dane Hughes for Peter Le.

The defendant drove Hughes to various stash locations to pick up drugs; he also drove Hughes to locations where Hughes met customers for marijuana, vape pens, other THC products, and other drugs. The customers often got into the defendant's car with Hughes to complete these transactions.

10. On or about January 25, 2018, the defendant was arrested in Fairfax County, Virginia, in the Eastern District of Virginia, in possession of marijuana, prescription narcotics, vape pens, THC oil, THC wax, and THC gummies, all of which he had obtained through Peter Le and which he intended to distribute.

11. During the course and in furtherance of this conspiracy, the defendant conspired to distribute and, together with his co-conspirators, did, in fact, possess with the intent to distribute and distribute, in excess of 100 kilograms of marijuana.

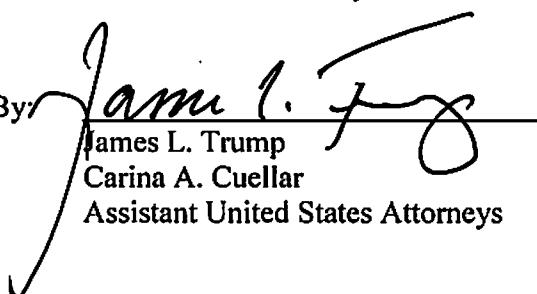
12. The acts taken by the defendant, Bradley William Sullivan, in furtherance of the offense charged in this case, including the acts described above, were done willfully and knowingly with the specific intent to violate the law. The defendant acknowledges that the foregoing statement of facts does not describe all of the defendant's conduct relating to the offenses charged in this case nor does it identify all of the persons with whom the defendant may

have engaged in illegal activities. The defendant further acknowledges that he is obligated under his plea agreement to provide additional information about this case beyond that which is described in this statement of facts.

Respectfully submitted,

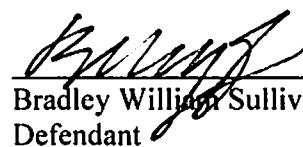
G. Zachary Terwilliger
United States Attorney

By:


James L. Trump
Carina A. Cuellar
Assistant United States Attorneys

After consulting with my attorney and pursuant to the plea agreement entered into this day between me and the United States, I hereby stipulate that the above Statement of Facts is true and accurate and that, had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Date: 9/23/19



Bradley William Sullivan
Defendant

I am Bradley William Sullivan's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: 9/23/19



Brian C. Drummond
Counsel for the Defendant